

is little evidence to suggest that the DNC or the White House made serious efforts to influence Interior's decision in any substantive way. Fowler did call an official at Interior – likely Collier – at the behest of the tribal opponents to relate what he had learned from the tribal representatives about the Hudson matter. Fowler may or may not – he could not recall – have conveyed explicitly the fact that these people were supporters of the DNC or Democratic Party; in any event, there is little doubt that the recipient of the call could have inferred as much from the fact of the call. Yet, Fowler denies that he suggested any linkage between financial contributions and the position the DNC supporters sought to advance and, with no one at Interior remembering such a call, there is no direct evidence to suggest otherwise.

Fowler also called Ickes and related what he had learned from the tribal representatives about the Hudson matter. At a minimum, Fowler communicated to Ickes that the opponent tribes were DNC supporters, who did not believe Interior had properly considered their view that the proposed casino would have a negative impact on their existing facilities. Fowler told Ickes that there was justification for reviewing Interior's decision-making process. However, Fowler does not recall asking Ickes to do anything in particular, though he expected that Ickes would look into it and "review the determination and the complaint" that O'Connor's group had brought to Fowler.<sup>758</sup> To follow-up on the call, Fowler sent a memorandum to Ickes, which largely tracks what Fowler says he told Ickes in the telephone call. For his part, Ickes stated that Fowler asked him to do nothing but make a "status check" on the Hudson matter, and that Ickes did nothing

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<sup>758</sup>Fowler G.J. Test. at 146.